

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
WILMA ANAISA SENCION : CHAPTER 13  
: :  
Debtor. :

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DEUTSCHE BANK NATIONAL TRUST :  
COMPANY, as Trustee, in trust for :  
registered Holders of Long Beach Mortgage :  
Loan Trust 2006-4, Asset -Backed :  
Certificates, Series 2006-4 :

Movant, :

vs. :

WILMA ANAISA SENCION : CASE NO. 5-24-02990  
Respondents. :

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**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY UNDER SECTION 362**

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AND NOW COMES, Wilma Sencion, the Debtor, and files an Answer to Deutsche Bank,  
NA's Motion for Relief From the Automatic Stay:

1. Wilma Sencion (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make monthly payments.
3. Counsel for Debtor is attempting to contact the Debtor to ascertain if the payments have been made and/or if the Debtor is in possession of the funds needed to cure the alleged default.
4. In the event there remains an arrears, the Debtor wishes to enter into a Stipulation to include the arrears in an amended Plan and/or over a six (6) month period.

5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: March 24, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID# 59887  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504  
(570) 347-7764

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on March 24, 2025, he caused a true and correct copy of Debtor's Answer to Deutsche Bank, NA's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Brent J. Lemon, Esq. at blemon@kmlawgroup.com

Dated: March 24, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire